

(Rev. 4/97)

FORM TO BE USED BY A PRISONER IN FILING A COMPLAINT
UNDER THE CIVIL RIGHTS ACT, 42 U.S.C. §1983

UNITED STATES DISTRICT COURT
DISTRICT OF DELAWARE

Case # 1:07 CV-637JJF

EDWARD WILLIAMS, SBI#350587
(Enter above the full name of the plaintiff in this action)

V.

Correctional Medical Services; Janes Doe & Johns Does, (Inc.)

et.al,

First Correctional Medical; Janes Doe & Johns Does,
Correctional Medical Services / Delaware Correct-
-ional Center Medical Department Janes Does & Johns
-Does, Delaware Correctional Center Medical Grievance
Committee Janes Does & Johns Does, D.C.C. Medical-
(Enter above the full name of the defendant(s) in this action)

Responder to Sick Call Request Slips, D.C.C Inmate Grie-
-vance Committee Janes Does & Johns Does, Contracted
Health Services Janes Does & Johns Does, Del. Correctional
Commissioner Carl Danberg, Former Commissioner STANLEY
TAYLOR, D.C.C Warden Thomas Carroll & Gov. of De. Ruth Ann Minner, and



I. Previous lawsuits

State of De, Atty. Gen. Beau Biden, OLD CORRECTIONAL Medical -
SERVICES & OFF. of Information of Corr. Medical Services *See Added page

A. Have you begun other lawsuits in state or federal courts dealing with the same facts involved in this action or otherwise relating to your imprisonment?
YES [] NO [X]

B. If your answer to A is yes, describe the lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit

Plaintiffs _____

Defendants _____

Added Page For Front Page of this 1983 Form:

" Defendants :

ST. LOUIS Based Correctional Medical Services employed
as Medical Service Provider For D.C.C 1181 Paddock
Rd. Smyrna De. 19977 ,

OFFICE OF INFORMATION ON INMATE MEDICAL SERVICES
Correctional Medical Services
1201 College Park Dr. Suite 101 Dover, De 19904

Joshua W. Martin III State of Delaware
Prisons Health Care Facilities Monitor, em-
ployed as State of Delaware Health -
Care Facilities Monitor; address:

Judge Joshua W. Martin III

Independent Monitor

Potter, Anderson & Corron, LLP

1313 N. Market St.

P.O. Box 951

Wilmington De. 19899

OLD Correctional Medical Services employed
as Medical Services Provider For D.C.C. Smyrna,
De. 19977 OLD CMS address 2 Reads Way
Suite 21 New Castle De. 19720

et. al. for Additional Jane & John Doe
Defendants of Amended Supplement Pleadings.
on back of this page.

Doctor/Surgeon: Levente SZALAI, address, Wolf Creek
Surgeons 103 Wolf Creek BLVD, Suite 1 Dover, De, 19901
Radiologist: Raphael Caccese Jr. Kent General —
Hospital Dover, De, 19901 and can be reached
at Dr. Levente SZALAI office address .

Dr. Ott and Dr. Vandusen employees of
D.C.C. Medical Department 1181 PADDOCK Rd .
Smyrna, De, 19977

Guards/C/O's of D.C.C Transportation
Jane Does & John Does 1181 PADDOCK Road
Smyrna Delaware 19977

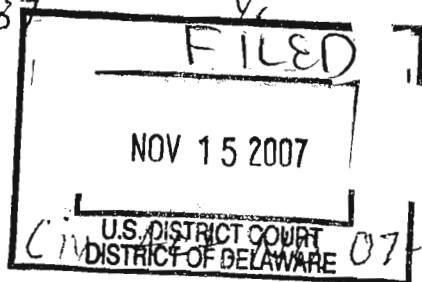
IN THE U.S. DISTRICT COURT FOR THE DISTRICT OF DELAWARE

EDWARD G. Williams

Correctional Medical Services:

SBI#350587

Plaintiff



et al

Defendants

this is plaintiff AMENDED and Supplemental Pleadings:

Pursuant to Rules of Civil Procedure Rule 15 (a), (b), (c) (1), (2), and (3) and (d) and it's proposed Amendment of Rule 15 effective December 1, 2007, absent contrary Congressional action, this rule is amended to read as follows: Rule-15 Amended and Supplemental Pleadings (a), (1), (A), (B), (2), (3) (b) (1) (2) (C) (1) (A) (B) (C) (i) (ii) (2) (d) ...

and Plaintiff seeks to Amend to the above Civil - Complaint EDWARD G. Williams, SBI#350587 Versus - Correctional Medical Services et al, Case No. 07CV637: JJF so as to add other party's names relevant to the Complaints as Defendants who are now

Saying I do not have a Ventral Hernia and my physical Condition is worsening after Two years and some months of being denied a colonoscopy and ventral hernia repair. On 11/01/07 I received a filing Fee Order that my Complaint EDWARD G. Williams - Versus Correctional Medical Services et.al, Civ. Act. No. 107-637-JJF has been accepted by U.S. Distr. Ct. dated 10/30/07.

On 11/02/07 I was taken out of D.C.C to see Doctor Levente SZALAI at his office address: Wolf Creek - Surgeons 103 Wolf Creek BLVD, Suite 1 Dover, De 19901 Dr. Levente SZALAI talk to me for at least 30 minutes telling me that I need a Colonoscopy and a ventral hernia repair and that ventral hernia repairs are a very difficult surgery that I maybe in the hospital For a Couple of days while he talked to me he showed me a "3" page Horizon WP --

Physician Portal on a screen of a lap top Computer, Dr. Levente SZALAI showed me the Ventral hernia and after I pointed to the lap top screen to the area where the Ventral hernia is at. Dr. Levente SZALAI told me he has to talk to his Radiologist Raphael Caccese Jr M.D., Doctor Levente SZALAI went into another room in his office and came back and said Mr. Williams you do not have a Ventral Hernia, and had me sign some medical papers for permission for him to do a Colonoscopy which he say he has to do first to see do I have colon cancer and to see if I have a Ventral hernia. The problem is the Radiologist

three page Kat scan say: "I do have a Ventral hernia measuring 9.8 cm in diameter with slight protrusion of the transverse colon through the hernia defect."

My condition has been this way since 10/17/05 my First visit to Dr. Levente SZALAI and my visits to him on 3/01/07 and 8/17/07 and the Kat scan is dated 8/08/07 Dr. SZALAI on all visits said I had a Ventral hernia and the Kat scan 'Attached' states I have a Ventral hernia. I want Dr. SZALAI and the RADIOLOGIST Mr. Raphael Calcese Jr. M.D. of Kent General Hospital Dover, De. 19901 to be added as defendants to my Civil Action Complaint Edward G. Williams SBI# 350587 v. Correctional Medical Services et al.

5

To Amend the Caption of the Civil Complaint
 as so Edward G. Williams SBI# 350587 - Versus -
 Correctional Medical Services et.al, to amend
 et.al to avoid other Jane & John Doe defendant Surprise amendments.
 Dr. Levente SZALAI and His Radiologist a Mr;
 RAPHAEL CALLESE JR to the civil Complaint
 as defendants who are giving contrary -
 conflicting medical opinions as to do
 I have a Ventral hernia or not. Contrary
 to their diagnosis of two years all Doctor said I have a Hernia.
 To Amend et.al to the caption For any
 Jane & John Doe defendants that may come
 up in the Discovery to Amend correct-
 -ional Medical Services Medical Doctor
 of its Insurance Company who claims
 My Condition is non-medical which is
 in the Discovery Medical File of plaintiff
 Edward G. Williams to Amend that D.C.C.
 Medical Doctor Vandusen diagnosed plaintiff
 has a hernia and showed plaintiff the
 Correctional Medical Services denied plain-
 -tiff Surgery claiming plaintiff condition
 is non-Medical and refuses to re-

6
 show me the dates I was denied to
 Amend in the Complaint that Dr. Ott
 after being asked by plaintiff ~~what~~ He
 been approved for a colonoscopy and
 ventral hernia repair. She said she
 thought I was in George Town Prison
 so she claims she had transferred my
 medical File to George Town To
 Amend her name to the civil
 complaint along with Dr. Vandusen
 same Address: D.C.C. Medical Dept. Drs.
 Vandusen and Doctor Ott D.C.C. 1181 PADDOCK
 ROAD SMYRNA. Delaware 19977 to be amended
 as additional Defendants to this law suite.

To Amend to the Complaint For U.S. Distr.
 Ct. to grant plaintiff an injunction for -
 prospective Relief to make D.C.C medical
 Dept. send me to another Outside Doctor
 and to another Radiologist to get
 plaintiff physically examined by them
 to see if plaintiff has colon cancer and
 to see if plaintiff has a "Ventral hernia
 measuring 9.8 cm in diameter with slight
 protrusion of the transverse Colon through
 the hernia defect. see third paragraph of pg. #
 1 of 3 of Horizon WP Physician Portal of Plaintiff
 Kat Scan of plaintiff "Williams" Abdominal Ventral Hernia.
 Attached requested to be Amended to Plaintiff

7

EDWARD G. Williams SBI#350587. Versus. Correctional -
Medical Services et al Civ. Act. NO. 1:07-637 JJF Lawsuite

to Amend an injunction for prospective relief
to Force D.C.C. medical services to have plain-
tiff seen by another outside Doctor and
Radiologist due to Dr. Levente SZALAI
and Radiologist Raphael Gaccese Jr
M.D. now claim plaintiff does not have
a Ventral Abdominal hernia to sue
them both individually and in their official
Capacity For misdiagnosis or for making a
fraudulent misdiagnosis by falsely claim-
ing Plaintiff do not have a abdominal -
hernia when the Kat Scan demonstrates plaintiff
has an ABDOMINAL VENTRAL HERNIA measuring
9.8 cm in diameter with slight protrusion of
the Transverse colon through the hernia
defect. Plaintiff request the Court
to grant an injunction For prospective
relief to have another Doctor and
another Radiologist examination and
Opinion of his Plaintiff physical
Condition which plaintiff has been
in pain daily For 2 years with hemmor-
oids Constipation bloody stools Constant
pain daily Abdominal pain From this
Hernia with a slight protrusion of the
transverse colon through the hernia
defect Plaintiff requests the Court to grant

8

Plaintiff "Williams" an injunction For prospective relief to be examined by another Doctor and Radiologist and it will demonstrate that plaintiff needs emergency colonoscopy and emergency hernia repair and hemorrhoid surgery and possible spreading of Colon Cancer plaintiff requests the Court to amend an injunction For prospective relief that D.C.C. medical services pay For all medical treatment and surgery to ensure the safety of plaintiff Life as plaintiff is, and, has been suffering now and For 2 years in some months in great pain daily of his Abdominal Hernia his colon and rectum From hemorrhoids and constipation due to D.C.C. medical services and Correctional medical services and all Defendants et. al, and Dr. Levente SZALAI and Radiologist MD. Mr Raphael Caccese Jr. misdiagnosis of plaintiff Medical Condition and Correctional Medical services deliberate indifference to purposely claim Plaintiff condition is non-medical to purposely not pay For plaintiff medical treatment. Plaintiff request to Amend his Civil Complaint

9

to Sue all Defendants individually and in their official Capacity for their deliberate indifference of purposely allowing Plaintiff "Williams" who is an American with Disabilities to suffer in pain now and for the last two years and months with out proper emergency medical treatment some days plaintiff is in so much pain From the Abdominal hernia, hemmoroids, constipation and colon hurts and rectum bleeds he can not walk. Plaintiff requests Amend ment of American Disabilities Act to prevent further discrimination against plaintiff who is already disabled and for 2 years his physical injuries ~~are~~ getting worst and his life is in greater danger of more physical injuries from being denied proper medical Care For Plaintiff Serious Medical Needs, to be Properly addressed which has been denied — for the last 2 years and months, and which if continued to be denied can kill Plaintiff.

To amend suing D.C.C. Medical Dept. and Correctional Services Provider ~~and~~ D.C.C. guards of medical Transportation Jane & John Does and all Defendants et. al., individually

10.

and in official capacity For a sum of \$ 50. million Dollars for their deliberate indifference of purposely denying Plaintiff access to transportation to outside Medical treatment D.C.C.

Medical Dept, Blames D.C.C. guards of transportation of denying Plaintiff a ride to outside Doctor and D.C.C. guards of transportation blame

D.C.C. medical of denying Plaintiff access to be put on list to be transported to outside Doctor for proper medical treatment For Plaintiff serious medical needs, demonstrates inadequate medical care and continuing violation of Plaintiffs rights.

Plaintiff seeks prospective relief for the Court to grant Plaintiff a preliminary injunction to prevent Plaintiff from irreparable harm which will hopefully prevent possible Colon Cancer or it spreading or will prevent Plaintiff from dying from explosion of the ABDOMINAL VENTRAL HERNIA bursting in his ABDOMEN which both can cause Plaintiff to Die. Plaintiff requests this Court grant Appointment of counsel to protect plaintiff right to life and Plaintiff requests to Amend that he is not

11

James Garnell Brown mentioned in point one of the Filing Fee Order nor is Plaintiff "Williams" a Brown v. Perillo No. 93-7117 (3d Cir. Apr. 22, 1993) or a Brown v. Snyder - Civ. Act. No. 93-156 JTF (D. Del. Mar 26, 1993 or a Brown v. Ryth Civ. Act. No. 93-097 SLR (D. Del Feb 24, 1993 or a Brown v. Chapman - Civ. Act. No. 92-744 LON (D. Del, Jan. 28 1993 or a Brown v. Perillo Civ. Act. No. 92-405 JTF (D. Del. Jan 15, 1993) or Brown v. Meyers Civ. Act. No. 92-592 SLR (D. Del. Oct 16, 1992) or a Brown v. Capone Civ. Act. No. 92-591- SLR (D. Del. Oct. 16, 1992) or Brown v. Letang Civ. Act. No. 92-423 SLR (D. Del. July 30, 1992) nor is Plaintiff "Williams" Brown v. Letang Civ. Act. No 92-422 SLR (D. Del. July 20, 1992)

All the Court has to do is check Plaintiff "Williams" arrest date May 17, 1997 and look at plaintiff SBI #350587 and plaintiff social security number 171-54-0753 and Plaintiff Edward G. Williams has never filed any Law suites in 1993 because plaintiff was not in prison in 1993 in the State of Delaware ever

For plaintiff "Williams" pain and suffering all Defendants et.al, responsible should

12

pay for medical and other expenses
 costs of courts For delivery of civil -
 Complaint upon all Defendants and
 For subpoenas and Transcripts
 and Discovery Transcripts and Lawyer
 Fees as well as Compensatory Damages
 to try to get plaintiff "Williams" back
 to the condition plaintiff was before
 he was denied proper medical treat-
 -ment For 2 years and months For
 his serious medical needs and to
 get punitive damages from all de-
 -fendants et al., who demonstrate neglect,
 to sue individually and official capacity
 For their obvious evil motive and in-
 -tent involving reckless deliberate in-
 difference to deny plaintiff his guaran-
 -teed U.S. Constitutional rights to
 Adequate medical care when all officials
 were on notice of plaintiff serious medical
 needs all officials defendants et al.,
 have hurt me on purpose daily by ig-
 -noring something so serious and yes
 dangerous as plaintiff diagnosis of an
 ABDOMINAL VENTRAL HERNIA and
 possible Colon Cancer which a
 Colonoscopy had been ordered and Hernia
 repair but all have been denied purposely
 by all Defendants et al., acting in concert
 Thus Plaintiff Amends to Sue all Defendants For \$50 million Dollars.

Plaintiff Edward G. Williams v. Correctional Medical Services et al., Civ. Act. NO. 107-637JJF request to Amend Evidences, as Exhibits For pages #2 and page #3 and additional page of Continued Statement of Claim All Copies of Sick call slips & Medical Grievances and letters to officials & Kat scan diagnosis of plaintiff Williams Ventral Hernia measuring 9.8. cm in diameter with slight protrusion of the transverse colon through the hernia defect.

To Amend the Cover Page of Plaintiff Civil Complaint Caption to read as such: EDWARD G. Williams v. Correctional Medical Services Et. al, Civ. Act. No. 107-637-JJF

To Amend Plaintiff Amended Supplemental Pleadings pursu. to Rule 15 (a)(b)(c) (1) (2) and (3) and (d) and His proposed Amendment of Rule 15 effective

Dec. 1, 2007 Rule 15 amended and Supplemental Pleadings (a) (1) (A)(B) (2) (3) (b) (1) (2) (C) (1) (A)(B) (i) (ii) and (2) (d)

Certificate of Service

I, EDWARD G. Williams SBI#350587, hereby certify that I have served a true

And correct cop(ies) of the attached: Plaintiff Amended and Supple-
mental Pleadings and Evidences as Exhibits upon the following
For PG'S #2, and #3 and additional pg. of Continued Statement
of Claim of Lawsuite "Williams v. Corr. Med. Services et al case NO:
parties/person(s):

TO: - 107-637 JJF "

TO: _____

TO: U.S. Distr. Ct. Distr. of De
Office of Clerk

TO: _____

844 N. King St lock Box 18
Wilm, De, 19801

BY PLACING SAME IN A SEALED ENVELOPE, and depositing same in the United States Mail at the Delaware Correctional Center, Smyrna, DE 19977.

On this 9th day of November, 2007

Edward G. Williams
SBI# 350587